

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

INNOVATIVE COMMUNICATION SYSTEMS, INC.,
d/b/a ICS,

Plaintiff,

V.

INNOVATIVE COMPUTING SYSTEMS, INC.,
d/b/a ICS,

Defendant

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Case No. 1:13-CV-1044-LY

**DEFENDANT'S MOTION REQUESTING AN EXPEDITED RULING ON
DEFENDANT'S MOTION TO COMPEL**

Defendant respectfully moves for an expedited ruling on its pending Motion to Compel. In support of this motion, Defendant states as follows.

Defendant filed its Motion to Compel answers to Interrogatory Nos. 10-13 on April 11, 2014. Plaintiff filed its Response late on April 25, 2014 which this Court excused by granting Plaintiff's Motion for Time to File Response which Plaintiff filed on April 28, 2014. A hearing was held before the Court on May 6, 2014 where the Court advised the parties that it would take the motion under consideration.

Pursuant to this case's Scheduling Order, discovery closes on July 31, 2014 with dispositive motions due less than two months later on September 14, 2014. Therefore, it is critical that Defendant receive answers to its discovery in order to adequately prepare for depositions. In addition, should the Court not grant Defendant's motion as to some or all of its requested responses, Defendant must serve additional discovery by the end of this month in order to receive responses by the close of discovery.

Given the above, Defendant respectfully requests that the Court grant its Motion Requesting an Expedited Ruling on Defendant's Motion to Compel.

The undersigned has consulted counsel for Plaintiff who has advised that Plaintiff, while not joining in this motion, does not oppose.

Respectfully Submitted,

Dated: June 18, 2014

By: /s/ Joshua G. Jones

Joshua G. Jones

Texas Bar No. 24065517

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that on June 18, 2014, the foregoing was filed via the cm/ecf system which will send notification of such filing to all parties of record.

/s/ Joshua G. Jones

Joshua G. Jones

CERTIFICATE OF CONFERENCE

I certify that on June 18, 2014, I contacted counsel for Plaintiff who advised that, while not joining in the motion, did not oppose.

/s/ Joshua G. Jones

Joshua G. Jones